



**EPA Office of Compliance  
Enforcement Targeting and Data Division**

# **AFS National Workshop**

San Francisco, CA

August 7-9, 2007

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Media Systems and Support Section, Data Systems and Information Management Branch, Enforcement Targeting and Data Division, Office of Compliance, Office of Enforcement and Compliance Assurance, U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, NW, Washington, D.C. 20460

# TARGETING COMPLIANCE WITH EMISSION LIMITS

- Excess Emissions Reporting
- Continuous Emissions Monitoring Systems

Keith Duncan



O K L A H O M A  
DEPARTMENT OF ENVIRONMENTAL QUALITY

# What's enforced?

Under Oklahoma rules, excess emissions do not necessarily trigger enforcement.

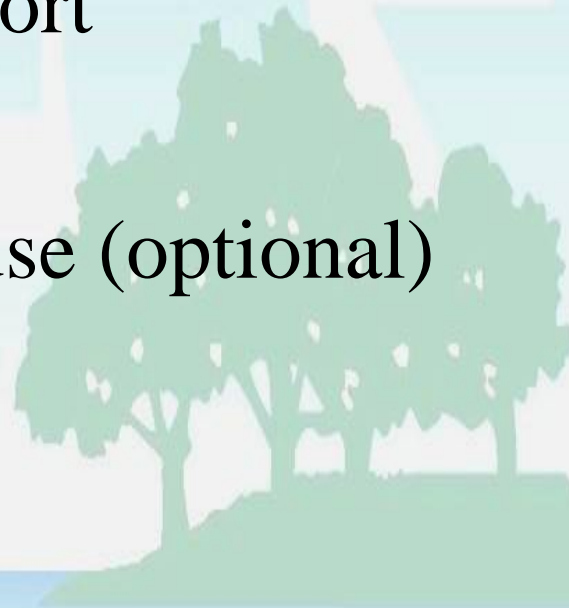
- OAC 252:100-9-1 contains detailed language and requirements
- Facility acts in good faith to minimize & correct exceedance
- Not egregious or pattern of violations
- Reporting requirements are met

# What's enforced?

- Malfunction and Maintenance/Startup/Shutdown handled differently
- Optional Demonstration of Cause report may be submitted to avoid penalties
- ODEQ may order corrective actions
- Excess emissions  $>1.5\%$  of total operating time per calendar quarter trigger further investigation

# Excess Emissions Reporting

- Immediate notification
- Official '10 Day' Report
- Demonstration of Cause (optional)



Login - Microsoft Internet Explorer provided by OK DEQ

File Edit View Favorites Tools Help

Back Forward Stop Home Search Favorites Refresh Print Mail Writable Folders People

Address <http://www.deq.state.ok.us/excessemissions/> Go


EXCESS EMISSION LOGIN PAGE

Company ID

Password

[DEQ Contact Info](#)



### Welcome to Excess Emissions Reporting Tool

In a continuing effort to improve Excess Emission reporting, the online system has been updated. You will notice that the "Add Another 10-day" button has been removed. You will now be limited to submitting one excess emission event per report. Therefore, you will need to submit an Immediate Notice for each excess emission event that occurs at your facility. We have also added several new data fields including: Phone No., Rule, and Permit No. Finally, the "Basis of Estimate" field is now open for all pollutants. If you have any questions, please call 405-702-4100 and you will be directed to someone who can help you.

Done Local intranet





## Immediate Notice

(Due by 4:30 PM next working day)

Facility

Company

County

SIC

Immediate Notification Date

Reporter

Phone No:  format (999) 999-9999

Event Start Date  Event End Date

Excess Emission ID  Event Reason

- Unknown
- Malfunction
- Maintenance
- Startup
- Shutdown
- Other

[Back to Main](#)



Thank you for submitting the immediate notification to the Department of Environmental Quality. You may come back anytime within 10 working days to submit 10 day notification. If you have further information about 10 day report you may enter it now by clicking the corresponding link below.

[Add Another Immediate Notice](#)

[Add 10-Day Report Information](#)

[Exit](#)

**Immediate Notice**  
(Due by 4:30 PM next working day)

Facility

Company

County

SIC

Immediate Notification Date

Reporter

\*

Phone No:  format (999) 999-9999

Event Start Date  Event End Date

Excess Emission ID  Event Reason

[Back to Main](#)

## Event - Official Written 10-Day Report

(Due within 10 working days)

Reporter <sup>\*</sup> K Duncan <sup>format (999) 999-9999</sup> Phone No: <sup>\*</sup> (405) 702-4140

Event Date(mm/dd/yyyy) <sup>\*</sup> 7/31/2007 <sup>\*</sup> Event Time(hh:mm) 14:23 <sup>\*</sup> Event Duration(min) 19 <sup>\*</sup>

Point Source boiler 1

Event Explanation and Remedy <sup>\*</sup>

Test malfunction.  
Test remedy.

Rule OAC 252:100-33 / Control of Emissions of Nitrogen Oxides

Permit No: <sup>\*</sup> 2007-999-0

Pollutant/CRS Number NITROGEN DIOXIDE / 10102440 <sup>\*</sup>

Basis of Estimate CEMS <sup>\*</sup> Certified Reader <sup>\*</sup>  
(required for Method 9 and 22)  
Explain (if Other)

For Method 22 facilities you need to enter Observation Period, Accumulated Time of Emissions and Emission frequency only. For all other cases you need Estimate Emissions, Allowed Emissions, Excess Emissions and Pollutant Units.

Estimated Emissions <sup>\*</sup> 29.7 <sup>\*</sup> Allowed Emissions 25 <sup>\*</sup> Excess Emissions 4.7 <sup>\*</sup> Pollutant Units ppm <sup>\*</sup>

Observation Period (min) <sup>\*</sup> Accumulated Time of Emissions (min) <sup>\*</sup> Emissions Frequency (%) <sup>\*</sup>

Add Pollutant Display/Edit Events Save Current D Submit Final Repd

[Back to Immediate Notification](#) | [Back to Main](#)

## Event - Official Written 10-Day Report

(Due within 10 working days)

Reporter  \* Phone No:  \*  
format (999) 999-9999

Event Date(mm/dd/yyyy)  \* Event Time(hh:mm)  \* Event Duration(min)  \*

Point Source  ▼

Event Explanation and Remedy \*

Rule  ▼

Permit No:  \*

Pollutant/CAS Number  ▼ \*

Basis of Estimate  ▼ Certified Reader   
(required for Method 9 and 22)

Explain (if Other)

Method 9  
Method 22  
Engineering Calculations  
Other

For Method 22 capacities you  
Estimated Emissions, Allow

Time of Emissions and Emission frequency only. For all other cases you need

Estimated Emissions

Allowed Emissions

Excess Emissions

Pollutant Units

Test malfunction.

Test remedy.

Rule OAC 252:100-33 / Control of Emissions of Nitrogen Oxides

Permit No: 2007-999-0

Pollutant/CAS Number NITROGEN DIOXIDE / 10102440

Basis of Estimate CEMS

Explain (if Other)

Certified Reader  
(required for Method 9 and 22)

For Method 23 opacities you need to enter Observation Period, Accumulated Time of Emissions and Emission frequency only. For all other cases you need Estimated Emissions, Allowed Emissions, Excess Emissions and Pollutant Units.

Estimated Emissions *	Allowed Emissions *	Excess Emissions *	Pollutant Units *
29.7	25	4.7	

Observation Period (min) *	Accumulated Time of Emissions (min)	Emissions Frequency

%

ppm

lbs

tons

lbs/mmbtu

mega grams

mg/L

Add Pollutant Display/Edit Events Save Current D Submit Final Repc

[Back to Immediate Notification](#) | [Back to Main](#)



2007  
**EXCESS EMISSIONS EVENTS REPORT**

Air Quality Division, Dept. of Environmental Quality, PO Box 1677, OKC, OK 73101-1677, (405)702-4100



**COMPANY NAME :** TESTCO  
**FACILITY NAME :** TEST PLANT 1  
**COUNTY :** Wagoner  
**SIC:** 1311

**EXCESS EMISSION ID : 7195**

Event Start Date : 7/31/2007  
Immediate Notification Date : 8/1/2007  
Event Reason : Malfunction

Event End Date : 7/31/2007  
Event Report Date :  
Reported By : Keith Duncan  
Phone No : (405) 702-4140

**EVENT ID : 9486**

Event Date : 7/31/2007  
Event Duration : 19  
Rule : OAC 252:100-33 / Control of Emissions of Nitrogen Oxides  
Reporter : K Duncan

Event Time : 2:23 PM  
Point Source : boiler 1  
Permit No : 2007-999-O  
Phone : (405) 702-4140

Explanation :

Test malfunction. Test remedy.

**POLLUTANT : NITROGEN DIOXIDE**

Actual Emissions : 29.70  
Excess Amount : 4.70  
Estimate Method : CEMS  
Method Description :  
Accumulated Time of Emissions : minutes

Allowed Limit : 25  
Pollutant Unit : ppm  
Certified Reader :  
Observation Period : minutes  
Emission Frequency : %

Print and Submit

Edit Event Data

## EXCESS EMISSIONS ADMINISTRATOR PAGE



LIST USER

EDIT USER

REFRESH AD USER

REVIEW DATA

ENTER DATA




## Excess Emission Events Review

Select the type of event you would like to review from the drop down list below :

-----Please Select Event Type-- 

-----Please Select Event Type-----

- All Submitted Events
- Accepted Events
- Rejected Events
- Not Reviewed Events
- Immediate Notifications only
- Accepted Immediate Notifications

CARDINAL GLASS PLT	7185	07/31/2007	07/31/2007	08/01/2007	08/01/2007	Unknown	Kenda Headley	Not Reviewed	CARDINAL FG C0	<a href="#">Edit</a>	<a href="#">View</a>	<a href="#">Delete</a>
SPRING CREEK POWER PLT	7190	08/01/2007	08/01/2007	08/01/2007	08/01/2007	Startup	Gregg Johnson	Not Reviewed	WESTAR ENGRY INC	<a href="#">Edit</a>	<a href="#">View</a>	<a href="#">Delete</a>
SPRING CREEK POWER PLT	7191	08/01/2007	08/01/2007	08/01/2007	08/01/2007	Startup	Gregg Johnson	Not Reviewed	WESTAR ENGRY INC	<a href="#">Edit</a>	<a href="#">View</a>	<a href="#">Delete</a>
SPRING CREEK POWER PLT	7192	08/01/2007	08/01/2007	08/01/2007	08/01/2007	Startup	Gregg Johnson	Not Reviewed	WESTAR ENGRY INC	<a href="#">Edit</a>	<a href="#">View</a>	<a href="#">Delete</a>
SPRING CREEK POWER PLT	7193	08/01/2007	08/01/2007	08/01/2007	08/01/2007	Startup	Gregg Johnson	Not Reviewed	WESTAR ENGRY INC	<a href="#">Edit</a>	<a href="#">View</a>	<a href="#">Delete</a>
SPRING CREEK POWER PLT	7194	08/01/2007	08/01/2007	08/01/2007	08/01/2007	Startup	Gregg Johnson	Not Reviewed	WESTAR ENGRY INC	<a href="#">Edit</a>	<a href="#">View</a>	<a href="#">Delete</a>
TEST PLANT 1	7195	07/31/2007	07/31/2007	08/01/2007	08/01/2007	Malfunction	Keith Duncan	Accepted 	TESTC0	<a href="#">Update</a> <a href="#">Cancel</a>	<a href="#">View</a>	<a href="#">Delete</a>

# CEMS

- May be required under NSPS, MACT, Acid Rain
- Quarterly summary report (follow 40CFR60.7)
  - Written report
  - Electronic (Excel format)
- Detailed report may be required based on emissions or monitor downtime

Microsoft Access - [CEMS Report Details]

FileEditViewInsertFormatRecordsToolsWindowHelp

Type a question for help

Export...HelpClose

CEMS Report Details

EditPrintAdd PCEExit

Add NewDiluent

CEMS Review Staff:HowellFirst Name: SharonPhone: (405) 702-4116

TEAM Point IDPoint NumberPoint Code:

076905FCC UnitC

CEMS Channel:199Report Quarter:200702YYQQ

Air Program Code(s):09Valid Program Codes are: 0, 9, V, 6, 7, 8, M, A, and/or 3

Total Source Operating Time:Hours:or Minutes:131040Time Period Code:M

	# of incidents:	Hours to Min Converter:	Minutes:	Percent Unavailability:
Monitor Equipment Malfunctions:			000000	0 %
Non Monitor Equip Malfunctions:			099480	99.9397 %
Calibration (QA):			000000	0 %
Unknown Monitor Downtime:			000000	0 %
Other Known Monitor Downtime:			000060	0.06028 %
Totals:	003		99540	75.962 %

	# of incidents:	Hours to Min Converter:	Minutes:	Percent of Operating Time Normalized:
StartUp/Shutdown Time:			001440	92.3077 %
Cleaning/Soot Blowing:			000000	0 %
Unknown Excess Emissions:			000000	0 %
Control Equipment Failure:			000000	0 %
Control Equip Malfunction Unacceptable:			000000	0 %
Process Problems:			000120	7.69231 %
Process Problems Unacceptable:			000000	0 %
Fuel Problems:			000000	0 %
Other Known Excess Emissions:			000000	0 %
Totals:	003		1560	100 %

Total Excess Emissions 11560

% of Total Operating Time w/Exceedances1.1904762 %

Total Monitor Downtime99540

Monitor Unavailability75.961538 %

Monitor Operations w/o Exceedances22.847985 %

Airs Date:Record Date:7/30/2007Record Staff:showell

Change Date:7/30/2007Change Staff:showell

Record:1 of 1 (Filtered)

Form ViewFLTR

Microsoft Access - [CEMS Report Details]

File Edit View Insert Format Records Tools Window Help

Type a question for help

Export... Help Close

## CEMS Report Details

Edit
Print
Add PCE
Exit

Add New
Diluent

CEMS ID: 3536    AIRS ID: 049-00003    Report Recieved Date: 7/18/2007  
Facility: WYNNEWOOD RFNRY CO    Company: WYNNEWOOD RFNRY CO  
County: GARVIN    SIC: 2911    Classification: Major  
CEMS Review Staff: Howell    First Name: Sharon    Phone: (405) 702-4116

TEAM Point ID    Point Number    Point Code:  
076    905    FCC Unit    C  
CEMS Channel: 199    Report Quarter: 200702    YYQQ

Air Program Code(s): 09    Valid Program Codes are: 0, 9, V, 6, 7, 8, M, A, and/or 3  
Total Source Operating Time:    Hours:    or Minutes: 131040    Time Period Code: M

	# of incidents:	Hours to Min Converter:	Minutes:	Percent Unavailability:
<b>Monitor Equipment Malfunctions:</b>			000000	0 %
<b>Non Monitor Equip Malfunctions:</b>			099480	99.9397 %
<b>Calibration (QA):</b>			000000	0 %
<b>Unknown Monitor Downtime:</b>			000000	0 %
<b>Other Known Monitor Downtime:</b>			000060	0.06028 %
<b>Totals:</b>	003		99540	75.962 %

Record:    1    of 1 (Filtered)

Form View

FLTR

Microsoft Access - [CEMS Report Details]

File Edit View Insert Format Records Tools Window Help

Type a question for help

Export... Help Close

# CEMS Report Details

Edit
Print
Add PCE
Exit

Add New
Diluent

	# of incidents:	Hours to Min Converter:	Minutes:		Percent of Operating Time Normalized:
StartUp/Shutdown Time:			001440	92.3077 %	4.571 %
Cleaning/Soot Blowing:			000000	0 %	0.000 %
Unknown Excess Emissions:			000000	0 %	0.000 %
Control Equipment Failure:			000000	0 %	0.000 %
Control Equip Malfunction Unacceptable:			000000	0 %	0.000 %
Process Problems:			000120	7.69231 %	0.381 %
Process Problems Unacceptable:			000000	0 %	0.000 %
Fuel Problems:			000000	0 %	0.000 %
Other Known Excess Emissions:			000000	0 %	0.000 %
Totals:	003		1560	100 %	4.952 %

Total Excess Emissions 1
1560

% of Total Operating Time w/Exceedances
1.1904762 %

Total Monitor Downtime
99540

Monitor Unavailability
75.961538 %

Monitor Operations w/o Exceedances:
22.847985 %

Airs Date:
Record Date: 7/30/2007
Record Staff: showell

Change Date: 7/30/2007
Change Staff: showell

Record:
1
of 1 (Filtered)

Form View

FLTR

More information, including Fact Sheets and  
workshop presentations, at

<http://www.deq.state.ok.us>

Keith Duncan

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(405) 702-4140

